

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES

v.

DARIUS A. PADUCH,

*Defendant.*

Crim. No. 1:23-cr-181 (RA)

**NOTICE OF FIRST SET OF  
MOTIONS *IN LIMINE***

*Oral Argument Requested*

**TO:** Marguerite Colson, Ass't United States Attorney  
Elizabeth Espinosa, Ass't United States Attorney  
Ni Quan, Ass't United States Attorney  
Jun Xiang, Ass't United States Attorney  
United States Attorney's Office – Southern District of New York  
1 St. Andrew's Plaza  
New York, NY 10007

**PLEASE TAKE NOTICE** that Defendant Darius A. Paduch, by and through counsel, Baldassare & Mara, LLC (Michael Baldassare, Esq., appearing), hereby moves before the Honorable Ronnie Abrams, United States District Judge, for the entry of an Order:

1. Precluding the government from eliciting expert testimony related to the standard of care;
2. Precluding the government from introducing evidence under Rule 413; and
3. Precluding the government and witnesses from using the term “victim”.

**PLEASE TAKE FURTHER NOTICE** that in support of his motions, Defendant Darius A. Paduch shall rely upon the accompanying memorandum of law, any future filings, and oral argument.

**PLEASE TAKE FURTHER NOTICE** that oral argument is hereby requested.

Respectfully submitted,

**BALDASSARE & MARA, LLC**

Dated: March 20, 2024

/s/ Michael A. Baldassare  
Michael A. Baldassare, Esq.